

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**STIPULATION AND ORDER ADJOURNING THE HEARING AND EXTENDING THE
OBJECTION DEADLINE ON THE TRUSTEE’S MOTION AND MEMORANDUM OF
LAW TO AFFIRM HIS DETERMINATIONS DENYING THE CLAIMS OF NEIL E.
BOTWINOFF, ROBERT E. HELPERN, JOEL S. HIRSCHTRITT, RALPH A.
SICILIANO, VINCENT J. SYRACUSE AND MICHAEL G. TANNENBAUM**

Irving H. Picard, as trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, and the chapter 7 estate of Bernard L. Madoff, on the one hand, and Neil E. Botwinoff, Robert E. Helpern, Joel S. Hirschtritt, Ralph A. Siciliano, Vincent J. Syracuse and Michael G. Tannenbaum (collectively, the “Claimants”), on the other hand, through their respective undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on December 9, 2019, the Trustee filed his combined motion and memorandum of law to affirm the Trustee’s determinations denying the customer claims filed by the Claimants (the “Motion”) (ECF No. 19202);

WHEREAS, the Motion is scheduled to be heard before the Court on January 22, 2020 at 10:00 a.m. (the “Hearing”); and

WHEREAS, the Claimants have requested and the Trustee has consented to an adjournment of the Hearing and the deadline to object to the Motion; and

NOW, IT IS HEREBY STIPULATED AND AGREED, by the undersigned herein that:

1. The Hearing on the Motion shall be adjourned to **March 25, 2020, at 10:00 a.m.**, as the Court’s calendar may allow.

2. The deadline for Claimants to file an objection to the Trustee’s Motion is hereby extended to and including **February 19, 2020**.

3. This Stipulation may be signed in any number of counterparts and a signature made by a facsimile or electronic copy shall have the same force and effect as an original signature.

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Dated: December 18, 2019
New York, New York

By: /s/ David J. Sheehan
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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the chapter 7 estate of Bernard L.
Madoff*

Dated: December 18th, 2019
New York, New York

By: /s/ Richard W. Trotter
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Vincent J. Syracuse and Michael G. Tannenbaum*

SO ORDERED:

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE